



Eckert Seamans Cherin & Mellott, LLC  
10 Bank Street  
Suite 700  
White Plains, NY 10606

TEL 914 949 2909  
FAX 914 949 5424  
www.eckertseamans.com

Mark E. Thabet  
Direct Dial: 914-949-7016  
mthabet@eckertseamans.com

December 14, 2012

**Via Electronic and Overnight Mail**  
**(Tracking No. 7943 0042 9652)**

Joseph H. Neiman, Esq.  
39 Hudson Street  
Hackensack, New Jersey 07601

Re: *John Pierro v. Daewoo Motor America, Inc., et al.*  
Docket No.: 1:08-cv-0063 (RJD) (JMA)

Dear Mr. Neiman:

We represent the defendant GM Daewoo Auto & Technology Company ("GMDAT") in connection with the above-referenced matter. In accordance with the Order of the Civil Briefing Schedule of Judge Raymond J. Dearie on November 20, 2012, we enclose the following:

1. Notice of Motion for Summary Judgment;
2. Brief of Defendant GMDAT;
3. Statement of Material Facts; and
4. Declaration of Mark E. Thabet in Support of Motion for Summary Judgment with attached Exhibits A thru L.

Please feel free to contact me should you have any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Mark E. Thabet".

Mark E. Thabet [MT 0871]

MET/tb

Enclosures

**Via Electronic and Regular Mail (w/o encls.)**

cc: Ellen Mulqueen, Case Manager  
c/o Judge Raymond J. Dearie  
U. S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201



Joseph H. Neiman, Esq.  
John Pierro v. Daewoo Motor America, Inc., et al.  
December 14, 2012  
Page 2

*Via Electronic and Regular Mail (w/encls.)*

T. Steven Har, Esq.  
Duane Morris, LLP  
1540 Broadway  
New York, NY 10036-4086

Philip W. Crawford, Esq.  
Gibbons P.C.  
One Gateway Center  
Newark, New Jersey 07102-5310